

REARDON ANDERSON, LLC

Erik Anderson, Esq. / 033232001

55 Gilbert Street North

Suite 2204

Tinton Falls, NJ 07701

p: (732) 758-8070

f: (732) 758-8071

Attorneys for Defendant Christine Giordano Hanlon,

In her official capacity as Monmouth County Clerk

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CHRISTINE CONFORTI,

Plaintiff,

v.

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
Official capacity as Ocean County Clerk,
And PAULA SOLLAMI COVELLO, in
her official capacity as Mercer County
Clerk,

Defendants.

:
: Civil Action No.: 3:20-cv-08267-FLW-TJB
:
: **ANSWER ON BEHALF OF DEFENDANT,**
: **CHRISTINE GIORDANO HANLON, IN**
: **HER OFFICIAL CAPACITY AS**
: **MONMOUTH COUNTY CLERK**
: **TO PLAINTIFF'S FIRST AMENDED**
: **COMPLAINT**
:
:
:
:
:
:
:
:
:
:

The defendant, Christine Giordano Hanlon, in her official capacity as Monmouth County Clerk, by way of answer to the plaintiff's complaint, says:

NATURE OF CASE

1. Paragraph one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

2. Paragraph two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

3. Paragraph three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

4. Paragraph four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

5. Paragraph five of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

6. Paragraph six of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

7. Paragraph seven of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

8. Paragraph eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

9. The defendant denies the allegations contained in paragraph nine of the Complaint.

10. The defendant denies the allegations contained in paragraph ten of the Complaint.

11. The defendant denies the allegations contained in paragraph eleven of the Complaint.

12. Paragraph twelve of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

13. Paragraph thirteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

JURISDICTION

14. This defendant neither admits nor denies the allegations contained in paragraph fourteen of the Complaint and leaves plaintiff to its proofs.

15. This defendant neither admits nor denies the allegations contained in paragraph fifteen of the Complaint and leaves plaintiff to its proofs.

16. This defendant neither admits nor denies the allegations contained in paragraph sixteen of the Complaint and leaves plaintiff to its proofs.

17. This defendant neither admits nor denies the allegations contained in paragraph seventeen of the Complaint and leaves plaintiff to its proofs.

18. This defendant neither admits nor denies the allegations contained in paragraph eighteen of the Complaint and leaves plaintiff to its proofs.

PARTIES

19. Paragraph nineteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

20. Paragraph twenty of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

21. Paragraph twenty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

22. Paragraph twenty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

23. The defendant has no knowledge as to paragraph twenty-three of the Complaint and leaves plaintiff to its proofs.

24. Paragraph twenty-four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

25. The defendant has no knowledge as to paragraph twenty-five of the Complaint and leaves plaintiff to its proofs.

26. Paragraph twenty-six of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

27. The defendant has no knowledge as to paragraph twenty-seven of the Complaint and leaves plaintiff to its proofs.

28. Paragraph twenty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

29. The defendant has no knowledge as to paragraph twenty-nine of the Complaint and leaves plaintiff to its proofs.

30. The defendant has no knowledge as to paragraph thirty of the Complaint and leaves plaintiff to its proofs.

31. The defendant has no knowledge as to paragraph thirty-one of the Complaint and leaves plaintiff to its proofs.

32. The defendant has no knowledge as to paragraph thirty-two of the Complaint and leaves plaintiff to its proofs.

33. Paragraph thirty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

34. The defendant has no knowledge as to paragraph thirty-four of the Complaint and leaves plaintiff to its proofs.

35. The defendant has no knowledge as to paragraph thirty-five of the Complaint and leaves plaintiff to its proofs.

36. The defendant has no knowledge as to paragraph thirty-six of the Complaint and leaves plaintiff to its proofs.

37. Paragraph thirty-seven of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

38. Paragraph thirty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

39. Paragraph thirty-nine of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

40. Paragraph forty of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

41. Paragraph forty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

42. Paragraph forty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

43. Paragraph forty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

44. Paragraph forty-four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

45. The defendant has no knowledge as to paragraph forty-five of the Complaint and leaves plaintiff to its proofs.

46. The defendant has no knowledge as to paragraph forty-six of the Complaint and leaves plaintiff to its proofs.

47. The defendant has no knowledge as to paragraph forty-seven of the Complaint and leaves plaintiff to its proofs.

48. Paragraph forty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

49. Paragraph forty-nine of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

50. Paragraph fifty of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

51. Paragraph fifty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

52. Paragraph fifty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

53. Paragraph fifty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

54. Paragraph fifty-four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

55. This defendant neither admits nor denies the allegations contained in paragraph fifty-five of the Complaint and leaves plaintiff to its proofs.

56. This defendant neither admits nor denies the allegations contained in paragraph fifty-six of the Complaint and leaves plaintiff to its proofs.

DEFENDANTS

57. The defendant admits the allegations contained in paragraph fifty-seven of the Complaint.

58. Paragraph fifty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

59. Paragraph fifty-nine of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

60. Paragraph sixty of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

61. Paragraph sixty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

62. Paragraph sixty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

63. The defendant admits the allegations contained in paragraph sixty-three of the Complaint.

64. Paragraph sixty-four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

65. Paragraph sixty-five of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

STATEMENT OF FACTS AND LAW

66. This defendant neither admits nor denies the allegations contained in paragraph sixty-six of the Complaint and leaves plaintiff to its proofs.

67. This defendant neither admits nor denies the allegations contained in paragraph sixty-seven of the Complaint and leaves plaintiff to its proofs.

68. This defendant neither admits nor denies the allegations contained in paragraph sixty-eight of the Complaint and leaves plaintiff to its proofs.

69. This defendant neither admits nor denies the allegations contained in paragraph sixty-nine of the Complaint and leaves plaintiff to its proofs.

70. This defendant neither admits nor denies the allegations contained in paragraph seventy of the Complaint and leaves plaintiff to its proofs.

71. This defendant neither admits nor denies the allegations contained in paragraph seventy-one of the Complaint and leaves plaintiff to its proofs.

72. The defendant denies the allegations contained in paragraph seventy-two of the Complaint.

73. The statute speaks for itself.

74. The statute speaks for itself.

75. This defendant neither admits nor denies the allegations contained in paragraph seventy-five of the Complaint and leaves plaintiff to its proofs.

76. The statute speaks for itself.

77. The statute speaks for itself.

78. This defendant neither admits nor denies the allegations contained in paragraph seventy-eight of the Complaint and leaves plaintiff to its proofs.

79. This defendant neither admits nor denies the allegations contained in paragraph seventy-nine of the Complaint and leaves plaintiff to its proofs.

80. This defendant neither admits nor denies the allegations contained in paragraph eighty of the Complaint and leaves plaintiff to its proofs.

81. This defendant neither admits nor denies the allegations contained in paragraph eighty-one of the Complaint and leaves plaintiff to its proofs.

82. The statute speaks for itself.

83. This defendant neither admits nor denies the allegations contained in paragraph eighty-three of the Complaint and leaves plaintiff to its proofs.

84. This defendant neither admits nor denies the allegations contained in paragraph eighty-four of the Complaint and leaves plaintiff to its proofs.

85. This defendant neither admits nor denies the allegations contained in paragraph eighty-five of the Complaint and leaves plaintiff to its proofs.

86. The defendant denies the allegations contained in paragraph eighty-six of the Complaint.

87. The defendant denies the allegations contained in paragraph eighty-seven of the Complaint.

88. The defendant denies the allegations contained in paragraph eighty-eight of the Complaint.

89. This defendant neither admits nor denies the allegations contained in paragraph eighty-nine of the Complaint and leaves plaintiff to its proofs.

90. This defendant neither admits nor denies the allegations contained in paragraph ninety of the Complaint and leaves plaintiff to its proofs.

91. This defendant neither admits nor denies the allegations contained in paragraph ninety-one of the Complaint and leaves plaintiff to its proofs.

92. This defendant neither admits nor denies the allegations contained in paragraph ninety-two of the Complaint and leaves plaintiff to its proofs. The defendant has no knowledge as to paragraph ninety-two of the Complaint and leaves plaintiff to its proofs.

93. This defendant neither admits nor denies the allegations contained in paragraph ninety-three of the Complaint and leaves plaintiff to its proofs. The defendant has no knowledge as to paragraph ninety-three of the Complaint and leaves plaintiff to its proofs.

94. This defendant neither admits nor denies the allegations contained in paragraph ninety-four of the Complaint and leaves plaintiff to its proofs.

95. The defendant denies the allegations contained in paragraph ninety-five of the Complaint.

96. This defendant neither admits nor denies the allegations contained in paragraph ninety-six of the Complaint and leaves plaintiff to its proofs. The defendant has no knowledge as to paragraph ninety-six of the Complaint and leaves plaintiff to its proofs.

97. The defendant denies the allegations contained in paragraph ninety-seven of the Complaint.

98. This defendant neither admits nor denies the allegations contained in paragraph ninety-eight of the Complaint and leaves plaintiff to its proofs. The defendant has no knowledge as to paragraph ninety-eight of the Complaint and leaves plaintiff to its proofs.

99. The defendant denies the allegations contained in paragraph ninety-nine of the Complaint.

100. The defendant denies the allegations contained in paragraph one hundred of the Complaint.

101. This defendant neither admits nor denies the allegations contained in paragraph one hundred one of the Complaint and leaves plaintiff to its proofs.

102. The defendant admits the allegations as to this defendant contained in paragraph one hundred two of the Complaint.

103. The ballot speaks for itself.

104. The defendant denies the allegations contained in paragraph one hundred four of the Complaint.

105. The ballot speaks for itself.

106. The defendant denies the allegations contained in paragraph one hundred six of the Complaint.

107. The ballot speaks for itself.

108. Paragraph one hundred eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

109. The ballot speaks for itself.

110. The defendant has no knowledge as to paragraph one hundred ten of the Complaint and leaves plaintiff to its proofs. Paragraph one hundred ten of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

111. The defendant has no knowledge as to paragraph one hundred eleven of the Complaint and leaves plaintiff to its proofs. Paragraph one hundred eleven of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

112. The defendant has no knowledge as to paragraph one hundred twelve of the Complaint and leaves plaintiff to its proofs. Paragraph one hundred twelve of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

113. Paragraph one hundred thirteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

114. The ballot speaks for itself.

115. Paragraph one hundred fifteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifteen of the Complaint and leaves plaintiff to its proofs.

116. Paragraph one hundred sixteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

117. Paragraph one hundred seventeen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred seventeen of the Complaint and leaves plaintiff to its proofs.

118. Paragraph one hundred eighteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred eighteen of the Complaint and leaves plaintiff to its proofs.

119. Paragraph one hundred nineteen of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred nineteen of the Complaint and leaves plaintiff to its proofs.

120. The ballot speaks for itself.

121. Paragraph one hundred twenty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-one of the Complaint and leaves plaintiff to its proofs.

122. Paragraph one hundred twenty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-two of the Complaint and leaves plaintiff to its proofs.

123. Paragraph one hundred twenty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-three of the Complaint and leaves plaintiff to its proofs.

124. Paragraph one hundred twenty-four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-four of the Complaint and leaves plaintiff to its proofs.

125. Paragraph one hundred twenty-five of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

126. Paragraph one hundred twenty-six of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-six of the Complaint and leaves plaintiff to its proofs.

127. The ballot speaks for itself.

128. Paragraph one hundred twenty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-eight of the Complaint and leaves plaintiff to its proofs.

129. Paragraph one hundred twenty-nine of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred twenty-nine of the Complaint and leaves plaintiff to its proofs.

130. Paragraph one hundred thirty of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty of the Complaint and leaves plaintiff to its proofs.

131. Paragraph one hundred thirty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-one of the Complaint and leaves plaintiff to its proofs.

132. Paragraph one hundred thirty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-two of the Complaint and leaves plaintiff to its proofs.

133. Paragraph one hundred thirty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-three of the Complaint and leaves plaintiff to its proofs.

134. The ballot speaks for itself.

135. Paragraph one hundred thirty-five of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-five of the Complaint and leaves plaintiff to its proofs.

136. Paragraph one hundred thirty-six of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-six of the Complaint and leaves plaintiff to its proofs.

137. Paragraph one hundred thirty-seven of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-seven of the Complaint and leaves plaintiff to its proofs.

138. Paragraph one hundred thirty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-eight of the Complaint and leaves plaintiff to its proofs.

139. Paragraph one hundred thirty-nine of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred thirty-nine of the Complaint and leaves plaintiff to its proofs.

140. The ballot speaks for itself.

141. Paragraph one hundred forty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

142. Paragraph one hundred forty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

143. The defendant admits the allegations contained in paragraph one hundred forty-three of the Complaint.

144. The ballot speaks for itself.

145. The defendant denies the allegations contained in paragraph one hundred forty-five of the Complaint.

146. The defendant denies the allegations contained in paragraph one hundred forty-six of the Complaint.

147. The defendant denies the allegations contained in paragraph one hundred forty-seven of the Complaint.

148. The defendant admits the allegations contained in paragraph one hundred forty-eight of the Complaint.

149. Paragraph one hundred forty-nine of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred forty-nine of the Complaint and leaves plaintiff to its proofs.

150. The ballot speaks for itself.

151. Paragraph one hundred fifty-one of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided.

152. Paragraph one hundred fifty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifty-two of the Complaint and leaves plaintiff to its proofs.

153. Paragraph one hundred fifty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifty-three of the Complaint and leaves plaintiff to its proofs.

154. The ballot speaks for itself.

155. Paragraph one hundred fifty-five of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifty-five of the Complaint and leaves plaintiff to its proofs.

156. Paragraph one hundred fifty-six of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifty-six of the Complaint and leaves plaintiff to its proofs.

157. Paragraph one hundred fifty-seven of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifty-seven of the Complaint and leaves plaintiff to its proofs.

158. Paragraph one hundred fifty-eight of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred fifty-eight of the Complaint and leaves plaintiff to its proofs.

159. The ballot speaks for itself and no response is necessary.

160. Paragraph one hundred sixty of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred sixty of the Complaint and leaves plaintiff to its proofs.

161. The ballot speaks for itself and no response is necessary.

162. Paragraph one hundred sixty-two of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred sixty-two of the Complaint and leaves plaintiff to its proofs.

163. Paragraph one hundred sixty-three of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred sixty-three of the Complaint and leaves plaintiff to its proofs.

164. Paragraph one hundred sixty-four of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred sixty-four of the Complaint and leaves plaintiff to its proofs.

165. The ballot speaks for itself and no response is necessary.

166. Paragraph one hundred sixty-six of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred sixty-six of the Complaint and leaves plaintiff to its proofs.

167. Paragraph one hundred sixty-seven of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred sixty-seven of the Complaint and leaves plaintiff to its proofs.

COUNT I

168. The defendant repeats the answers to the allegations contained in the preceding Counts of the Complaint as if the same were set forth herein at length.

169. This defendant neither admits nor denies the allegations contained in paragraph one hundred sixty-nine of Count I of the Complaint and leaves plaintiff to its proofs.

170. This defendant neither admits nor denies the allegations contained in paragraph one hundred seventy of Count I of the Complaint and leaves plaintiff to its proofs.

171. The defendant denies the allegations contained in paragraph one hundred seventy-one of Count I of the Complaint.

172. The defendant denies the allegations contained in paragraph one hundred seventy-two of Count I of the Complaint.

173. The defendant denies the allegations contained in paragraph one hundred seventy-three of Count I of the Complaint.

174. The defendant denies the allegations contained in paragraph one hundred seventy-four of Count I of the Complaint.

175. The defendant denies the allegations contained in paragraph one hundred seventy-five of Count I of the Complaint.

176. This defendant neither admits nor denies the allegations contained in paragraph one hundred seventy-six of Count I of the Complaint and leaves plaintiff to its proofs.

177. The defendant denies the allegations contained in paragraph one hundred seventy-seven of Count I of the Complaint.

178. The defendant denies the allegations contained in paragraph one hundred seventy-eight of Count I of the Complaint.

179. This defendant neither admits nor denies the allegations contained in paragraph one hundred seventy-nine of Count I of the Complaint and leaves plaintiff to its proofs.

180. The defendant denies the allegations contained in paragraph one hundred eighty of Count I of the Complaint.

181. The defendant denies the allegations contained in paragraph one hundred eighty-one of Count I of the Complaint.

182. The defendant denies the allegations contained in paragraph one hundred eighty-two of Count I of the Complaint.

COUNT II

183. The defendant repeats the answers to the allegations contained in the preceding Counts of the Complaint as if the same were set forth herein at length.

184. The defendant denies the allegations contained in paragraph one hundred eighty-four of Count II of the Complaint.

185. The defendant denies the allegations contained in paragraph one hundred eighty-five of Count II of the Complaint.

186. The defendant denies the allegations contained in paragraph one hundred eighty-six of Count II of the Complaint.

187. This defendant neither admits nor denies the allegations contained in paragraph one hundred eighty-seven of Count II of the Complaint and leaves plaintiff to its proofs.

188. The defendant denies the allegations contained in paragraph one hundred eighty-eight of Count II of the Complaint.

189. This defendant neither admits nor denies the allegations contained in paragraph one hundred eighty-nine of Count II of the Complaint and leaves plaintiff to its proofs.

190. This defendant neither admits nor denies the allegations contained in paragraph one hundred ninety of Count II of the Complaint and leaves plaintiff to its proofs.

191. The defendant denies the allegations contained in paragraph one hundred ninety-one of Count II of the Complaint.

192. The defendant denies the allegations contained in paragraph one hundred ninety-two of Count II of the Complaint.

193. The defendant denies the allegations contained in paragraph one hundred ninety-three of Count II of the Complaint.

194. The defendant denies the allegations contained in paragraph one hundred ninety-four of Count II of the Complaint.

COUNT III

195. The defendant repeats the answers to the allegations contained in the preceding Counts of the Complaint as if the same were set forth herein at length.

196. The defendant denies the allegations contained in paragraph one hundred ninety-six of Count III of the Complaint.

197. The defendant denies the allegations contained in paragraph one hundred ninety-seven of Count III of the Complaint.

198. The defendant denies the allegations contained in paragraph one hundred ninety-eight of Count III of the Complaint.

199. Paragraph one hundred ninety-nine of Count III of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph one hundred ninety-nine of Count III of the Complaint and leaves plaintiff to its proofs.

200. Paragraph two hundred of Count III of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph two hundred of Count III of the Complaint and leaves plaintiff to its proofs.

201. Paragraph two hundred one of Count III of the Complaint does not pertain to this defendant; and, accordingly, no answer is provided. The defendant has no knowledge as to paragraph two hundred one of Count III of the Complaint and leaves plaintiff to its proofs.

202. The defendant denies the allegations contained in paragraph two hundred two of Count III of the Complaint.

203. The defendant denies the allegations contained in paragraph two hundred three of Count III of the Complaint.

204. The defendant denies the allegations contained in paragraph two hundred four of Count III of the Complaint.

205. The defendant denies the allegations contained in paragraph two hundred five of Count III of the Complaint.

206. The defendant denies the allegations contained in paragraph two hundred six of Count III of the Complaint.

207. The defendant denies the allegations contained in paragraph two hundred seven of Count III of the Complaint.

208. The defendant denies the allegations contained in paragraph two hundred eight of Count III of the Complaint.

COUNT IV

209. The defendant repeats the answers to the allegations contained in the preceding Counts of the Complaint as if the same were set forth herein at length.

210. The United States Constitution speaks for itself and no response is necessary.

211. This defendant neither admits nor denies the allegations contained in paragraph two hundred eleven of Count IV of the Complaint and leaves plaintiff to its proofs.

212. This defendant neither admits nor denies the allegations contained in paragraph two hundred five of Count IV of the Complaint and leaves plaintiff to its proofs.

213. This defendant neither admits nor denies the allegations contained in paragraph two hundred thirteen of Count IV of the Complaint and leaves plaintiff to its proofs.

214. This defendant neither admits nor denies the allegations contained in paragraph two hundred fourteen of Count IV of the Complaint and leaves plaintiff to its proofs.

215. The defendant denies the allegations contained in paragraph two hundred fifteen of Count IV of the Complaint.

216. The defendant denies the allegations contained in paragraph two hundred sixteen of Count IV of the Complaint.

217. The defendant denies the allegations contained in paragraph two hundred seventeen of Count IV of the Complaint.

218. The defendant denies the allegations contained in paragraph two hundred eighteen of Count IV of the Complaint.

219. The defendant denies the allegations contained in paragraph two hundred nineteen of Count IV of the Complaint.

220. The defendant denies the allegations contained in paragraph two hundred twenty of Count IV of the Complaint.

221. The defendant denies the allegations contained in paragraph two hundred twenty-one of Count IV of the Complaint.

COUNT V

222. The defendant repeats the answers to the allegations contained in the preceding Counts of the Complaint as if the same were set forth herein at length.

223. This defendant neither admits nor denies the allegations contained in paragraph two hundred twenty-three of Count V of the Complaint and leaves plaintiff to its proofs.

224. The defendant denies the allegations contained in paragraph two hundred twenty-four of Count V of the Complaint.

225. The defendant denies the allegations contained in paragraph two hundred twenty-five of Count V of the Complaint.

SEPARATE DEFENSES

1. This defendant violated no legal duty owing to the plaintiff.
2. The Complaint herein fails to state a claim upon which relief can be granted as to this defendant, and this defendant reserves the right to move, at or before the time of trial, to dismiss the Complaint for failure to state a claim upon which relief can be granted.
3. This court lacks jurisdiction over the person of this defendant by reason of insufficiency of process and reserves the right to move at or before trial for a dismissal of the Complaint on the ground of lack of jurisdiction because of insufficiency of Process and/or service.
4. The Complaint is barred by the applicable Statute of limitations.
5. This defendant has properly applied New Jersey law in connection with her statutory oversight of elections and as such, plaintiffs have no viable cause of action and/or is entitled to damages sought.
6. The statutes challenged by the plaintiffs are constitutional and as such plaintiffs do not have a viable cause of action.
7. Plaintiffs claims are barred by the doctrines of res judicata, collateral estoppel, laches, waiver and/or unclean hands.

8. Plaintiffs have suffered no damages.
9. This defendant has not breached any duty owed to plaintiffs.
10. Plaintiffs' claims are barred by the doctrines of qualified, absolute, constitutional and/or statutory immunity of the defendant.
11. Plaintiffs claims are barred as this matter is not ripe.
12. Plaintiffs lack standing to bring this action.
13. This defendant acted within her scope of authority and performed her duties in good faith.
14. Plaintiffs' claims are barred as they have failed to exhaust all administrative remedies prior to filing the instant action.
15. Plaintiffs' claims are barred as they are moot.
16. This defendant reserves the rights to amend her answer and assert additional defenses as additional investigation and discovery warrant.

Designation of Trial Counsel

Erik Anderson is hereby designated as trial counsel for this matter.

Rule 11.2 Certification

I certify that to the best of my knowledge the matter in controversy is not subject to another proceeding, on future proceedings are contemplated and no additional party should be joined in the within action at this time.

REARDON ANDERSON LLC

Attorneys for Defendant,
Christine Giordano Hanlon, in her
official capacity as Monmouth
County Clerk

BY: Erik Anderson
ERIK ANDERSON

DATE: July 28, 2022